

# **EXHIBIT A**

**REDACTED VERSION  
OF DOCUMENT  
SOUGHT TO BE SEALED**

Page 1

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING,  
INC.,

Defendants.

/

WAYMO & UBER CONFIDENTIAL ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF CAMERON POETZSCHER

SAN FRANCISCO, CALIFORNIA

MONDAY, JUNE 19, 2017

BY: ANDREA M. IGNACIO,  
CSR, RPR, CRR, CCRR, CLR  
CSR LICENSE NO. 9830  
JOB NO. 2642012

Page 32

1 all, I'm not going to speculate about what will happen 09:18  
2 in the future. Second of all, I can say that to date, 09:18  
3 we've only paid [REDACTED] for Otto. 09:18

4 MS. ROBERTS: Okay. 09:18

5 Q So, as of today, June 19th, Uber has only 09:18  
6 paid [REDACTED] for the acquisition of Otto? 09:18

7 A As far as I'm aware. 09:18

8 Q Has Uber separately paid Anthony Levandowski 09:18  
9 or Lior Ron in connection with the acquisition? 09:18

10 A Not that I'm aware of. 09:18

11 Q So, we've spoken about Mr. Levandowski 09:18  
12 already. 09:18

13 Do you recall the first time that you met 09:18  
14 him? 09:18

15 A I don't recall the exact date, but I believe 09:18  
16 it was in -- sometime around September of 2015. 09:18

17 Q September of 2015? 09:18

18 A Uh-huh. 09:18

19 Q And that -- this was the first time you met 09:18  
20 him in person? 09:18

21 A Yes. 09:18

22 Q Had you heard of him prior to that? 09:18

23 A Yes, but only just before that meeting; you 09:18  
24 know, a matter of days or weeks before that meeting. 09:18

25 Q Okay. So, you first met him at a meeting in 09:18

Page 135

1 important to have that control right away? 11:34

2 A I mean, it's the same reason [REDACTED] [REDACTED]

5 In fact, in relation to what I told you about 11:34

6 the deal originally, in late 2015 it was a 11:34

7 [REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] 11:34

12 Q Why not just hire them as employees of Uber? 11:34

13 A That's essentially what we did; right. 11:34

14 Ultimately, we hired them. [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

22 Q But what was -- was there a value add to 11:35

23 acquiring NewCo, and with it, the engineers, as 11:35

24 opposed to just hiring those engineers -- 11:35

25 MR. JACOBS: Objection -- 11:35

WAYMO & UBER CONFIDENTIAL - ATTORNEYS EYES ONLY

1 CERTIFICATE OF REPORTER  
2

3 I, ANDREA M. IGNACIO, hereby certify that the  
4 witness in the foregoing deposition was by me duly  
5 sworn to tell the truth, the whole truth, and nothing  
but the truth in the within-entitled cause;

6 That said deposition was taken in shorthand  
7 by me, a disinterested person, at the time and place  
8 therein stated, and that the testimony of the said  
9 witness was thereafter reduced to typewriting, by  
computer, under my direction and supervision;

10 That before completion of the deposition,  
11 review of the transcript [x] was [ ] was not  
12 requested. If requested, any changes made by the  
13 deponent (and provided to the reporter) during the  
14 period allowed are appended hereto.

15 I further certify that I am not of counsel or  
16 attorney for either or any of the parties to the said  
17 deposition, nor in any way interested in the event of  
this cause, and that I am not related to any of the  
parties thereto.

19 Dated: June 20, 2017  
20

21   
22

23 ANDREA M. IGNACIO,

25 RPR, CRR, CCRR, CLR, CSR No. 9830